

MARQUIS AURBACH

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**Marquis Aurbach**

Nick D. Crosby, Esq.

Nevada Bar No. 8996

Lance C. Earl, Esq.

Nevada Bar No. 2695

W. Reese Levins, Esq.

Nevada Bar No. 15951

10001 Park Run Drive

Las Vegas, Nevada 89145

Telephone: (702) 382-0711

Facsimile: (702) 382-5816

ncrosby@maclaw.com

learl@maclaw.com

rlevins@maclaw.com

Attorneys for Plaintiff The Puliz Companies

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

THE PULIZ COMPANIES, INC., a Nevada corporation,

Plaintiff

vs.

RENEWABLE ENERGY PARK LLC, a Wyoming limited liability company, REP NOTE HOLDERS LLC, a Wyoming limited liability company, TERRASCALE INC., a Delaware corporation, STEPHEN HOSHIMI, an individual, KEVIN ANNIS, an individual, KAYA STANLEY, an individual.

Defendants

Case No.: 2:23-cv-00428-CDS-BNW

**ORDER GRANTING  
STIPULATION TO EXTEND TIME  
FOR PLAINTIFF TO RESPOND TO:**

**(A) DEFENDANTS KEVIN ANNIS' AND KAYA STANLEY'S MOTION TO DISMISS PLAINTIFF'S FEDERAL CLAIMS (BROUGHT UNDER SECTIONS 12(A)(1) AND 12(A)(2) OF THE SECURITIES ACT OF 1933) [ECF NO. 21]; AND**

**(B) DEFENDANTS RENEWABLE ENERGY PARK, LLC AND STEPHEN HOSHIMI'S JOINDER TO THE MOTION TO DISMISS**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, THE PULIZ COMPANIES, INC. ("Puliz"), Defendants, KEVIN ANNIS and KAYA STANLEY (collectively, the "Annis/Stanley Parties"), and Defendants, RENEWABLE ENERGY PARK LLC, a Wyoming limited liability company, and STEPHEN HOSHIMI,

MARQUIS AURBACH

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

(collectively, the “Hoshimi Parties”) by and through their respective attorneys of record, that Plaintiff may have additional time to file its response to:

- a. *“Motion to Dismiss Plaintiff’s Federal Claims (Brought Under Sections 12(A)(1) and 12(A)(2) Of the Securities Act of 1933”* [ECF NO. 21] (“Motion to Dismiss”) filed by Defendants, Kevin Annis and Kaya Stanley, and
- b. *“Joinder to the Motion to Dismiss Plaintiff’s Federal Claims (Brought Under Sections 12(A) And 12(A)(2) of the Securities Act of 1933”* [ECF 22] (“Joinder”)

**Plaintiff shall have until July 14, 2023 to file its opposition to the Motion to Dismiss.**

Counsel for Puliz, the Annis/Stanley Parties, and the Hoshimi Parties have been, and are engaged in discussions anticipated to resolve the dispute addressed in the Motion. However, with the upcoming July 4 Holiday and conflicting schedules, counsel have mutually agreed that additional time is required. Accordingly, this extension to July 14, 2023 is intended to permit the parties necessary additional time and opportunity to further confer in an effort to resolve the dispute addressed in the Motion to Dismiss and Joinder.

Respectfully submitted this 30<sup>th</sup> day of June, 2023.

MARQUIS AURBACH

HUMPHREY O’ROURKE PLLC

By: /s/ Lance C. Earl, Esq.  
Lance C. Earl, Esq.  
Nevada Bar No. 2695  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
*Attorneys for Plaintiff The Puliz Companies*

By: /s/ L. Edward Humphrey, Esq.  
L. Edward Humphrey, Esq. NSB 9066  
Patrick O’Rourke, Esq. NSB 13557  
201 W. Liberty Street, Ste 350  
Reno, Nevada 89501  
*Attorneys for Defendants Kevin Annis and Kaya Stanley*

1 DAVID J. WINTERTON & ASSOCIATES,  
2 LTD.

3  
4 By: /s/ David J. Winterton, Esq.

5 David J. Winterton, Esq.  
6 Nevada Bar No. 4142  
7 7881 W. Charleston Blvd. Suite 220  
8 Las Vegas, Nevada 89117  
9 *Attorneys for Defendant Stephen*  
10 *Hoshimi*

11  
12 **ORDER**

13 IT IS THEREFORE ORDERED that plaintiff shall have until July 14, 2023, to file  
14 its opposition to the Motion to Dismiss.

15  
16   
17 \_\_\_\_\_  
18 UNITED STATES DISTRICT JUDGE

19 DATED: July 5, 2023  
20  
21  
22  
23  
24  
25  
26  
27  
28

MARQUIS AURBACH

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816